

EXHIBIT 4

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

STEVEN CASAS, individually, and on
behalf of all other similarly situated
consumers,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,
LLC; VERIZON WIRELESS;
JEFFERSON CAPITAL SYSTEMS,
LLC,

Defendants.

CASE NO: 4:18-CV-04444

DECLARATION OF MARGARET LESLIE

I, Margaret Leslie, make this declaration under penalty of perjury and pursuant to
28 U.S.C. § 1746, as follows:

1. I am over 21 years of age and have personal knowledge of the matters stated in
this declaration based upon my experience and review of Equifax's records. I am competent in
all respects to provide this declaration.

2. I am employed as Vice President of Legal for Equifax Information Services LLC
("Equifax"). I have been in this position since February 2015. Before assuming my current role, I
was Vice President of Core Data Platforms Technology from March 2007 to February 2015. In
that capacity, I was responsible for Equifax's consumer credit reporting system and the system
involved in generating and retrieving consumer reports. I was also responsible for the data
quality assurance system, model implementation group, and the Exchange system. In all, I have
been employed by Equifax since 1990.

3. Equifax does not, in the ordinary course of business, keep or maintain consumer reports that it issues about consumers to third parties. It also does not, in the ordinary course of business, endeavor to determine whether or how it reported specific items of information about specific consumers at some point in the past.

4. “Frozen scans” are snapshots of Equifax’s primary credit reporting database that are typically recorded near the end of each month. Frozen scans are stored in a binary, non-human readable flat file format aggregated for all consumers and have to be sorted and converted in order to be used in litigation by a particular consumer. Frozen scans are also not stored in a database that Equifax can query to search for information. For example, it is not possible to run a query for a Verizon account in the frozen scans as you would by typing a phrase into a search engine like Google.

5. Frozen scans yield limited information. While a frozen scan identifies “users” of consumer information (such as potential creditors to whom Equifax issued a consumer report about a particular consumer), it does not catalogue the information that any particular consumer report included. In fact, Equifax does not have the ability to determine what information was included on any particular consumer report, as users of consumer reports purchase a variety of products that range from a mere credit score to a full consumer report with many variations in between (such as a partial report that includes only certain types of tradelines or certain attributes of a consumer’s credit file).

6. Based on my knowledge of Equifax’s systems and my experience attempting to obtain information from those systems, the information Plaintiff wants from the frozen scans is not accessible to Equifax.

Dated this 18th day of February, 2021.


Margaret Leslie